

Exhibit B

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*NOT ADMITTED TO THE NEW YORK BAR

Re: People of the State of New York v. Exxon Mobil Corporation, No. 452044/2018

Dear Ms. Wu,

We represent Exxon Mobil Corporation ("ExxonMobil") in the above-referenced litigation, which is scheduled for trial in New York beginning on October 23, 2019. The New York Attorney General ("NYAG") has identified As You Sow employee Danielle Fugere as a potential witness on its June 26, 2019 witness list.

We understand that Ms. Fugere resides and works in California, and therefore cannot be compelled to testify at a trial in New York, but nonetheless may be willing to testify voluntarily. If Ms. Fugere does not plan to make herself available to testify in the trial of this matter, please let us know. In the event that Ms. Fugere will testify at trial, however, NYAG has agreed that Defendant ExxonMobil is entitled to discovery concerning her relevant knowledge. This discovery will include both a documentary subpoena and a testimonial subpoena for a pre-trial deposition.

Please confirm by July 9, 2019, whether Ms. Fugere plans to testify at the trial of this matter. If you have any questions, do not hesitate to contact me at dtoal@paulweiss.com or (212) 373-3869.

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

Sylvia Wu, Esq.

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Sincerely,

/s/ Daniel J. Toal

Daniel J. Toal, Esq.

cc: Theodore V. Wells, Jr., Esq. Patrick Conlon, Esq.
Justin Anderson, Esq.
Nora Ahmed, Esq.